

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:23-cv-00496-FL**

INTERDIGITAL INC., INTERDIGITAL	)	
VC HOLDINGS, INC., INTERDIGITAL	)	
PATENT HOLDINGS, INC., and	)	
INTERDIGITAL MADISON PATENT	)	
HOLDINGS SAS,	)	
	)	
Plaintiffs,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	
LENOVO GROUP LIMITED, LENOVO	)	
(UNITED STATES) INC., and MOTOROLA	)	
MOBILITY LLC.,	)	
	)	
	)	
Defendants.	)	

**PROPOSED SCHEDULING ORDER**

Event	Proposed Date
Parties to serve initial disclosures and accompanying documents pursuant to Fed. R. Civ. P. 26(a)(1)	November 17, 2023 (Friday)
Beginning of fact discovery	November 17, 2023 (Friday)
InterDigital to serve “Disclosure of Asserted Claims and Preliminary Infringement Contentions” and accompanying document production (Local Patent Rules 303.1 and 303.2)	December 4, 2023 (Monday)
Lenovo to serve “Preliminary Invalidity Contentions” and accompanying document production (Local Patent Rules 303.3 and 303.4)	January 18, 2024 (Thursday)

<b>Event</b>	<b>Proposed Date</b>
Parties to simultaneously exchange terms and claim elements for construction (Local Patent Rule 304.1)	February 8, 2024 (Thursday)
Parties to simultaneously exchange preliminary proposed constructions and provide preliminary identification of extrinsic evidence, including disclosures of percipient and expert witnesses (Local Patent Rule 304.2)	February 29, 2024 (Thursday)
Deadline for substantial completion of initial document production for requests to produce documents served on or before December 15, 2023.	March 1, 2024 (Friday)
Parties to file Joint Claim Construction Statement (Local Patent Rule 304.3)	March 18, 2024 (Tuesday)
Parties to complete all discovery relating to claim construction (Local Patent Rule 304.4)	April 17, 2024 (Wednesday)
Parties to file opening claim construction briefs (Local Patent Rule 304.5(a))	May 2, 2024 (Thursday)
Parties to file responsive claim construction briefs (Local Patent Rule 304.5(b))	May 23, 2024 (Thursday)
Claim construction hearing (Local Patent Rule 304.6)	At the Court's discretion if a hearing is deemed necessary
InterDigital to serve "Final Infringement Contentions" (Local Patent Rule 303.6(b))	No later than 30 days after entry of claim construction order

Event	Proposed Date
Lenovo to serve “Final Invalidity Contentions” (Local Patent Rule 303.6(d))	No later than 50 days after entry of claim construction order
Disclosure of reliance on advice of counsel (Local Patent Rule 303.8(a))	30 days prior to close of fact discovery
Close of fact discovery	90 days after entry of claim construction order
Parties to serve initial expert witness disclosures (including reports) on issues they bear the burden of proof (other than those addressed during claim construction) (Local Patent Rule 305.1(b))	30 days after close of fact discovery
Parties to serve expert witness disclosures (including reports) on issues on which the opposing party bears the burden of proof (Local Patent Rule 305.1(c))	30 days after opening expert reports
Parties to serve rebuttal expert witness disclosures (including reports) (Local Patent Rule 305.1(d))	14 days after responsive expert reports
Beginning of expert depositions (Local Patent Rule 305.2)	Within 7 days of service of rebuttal expert reports
Close of expert discovery	Within 30 days of commencement of expert deposition period
Deadline for filing dispositive motions and Daubert motions (Fed. R. Civ. P. 56(b); Local Civil Rule 7.1(a))	30 days after close of expert discovery

Event	Proposed Date
Final Pretrial Conference	TBD
Start of trial	TBD